

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' FORTY-SECOND (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR PARTIALLY
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the forty-second omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and modifying and reducing the Overstated and/or Partially Unliquidated Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated and/or Partially Unliquidated Claim set forth in Schedule 1 attached hereto is modified and reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. To the extent a response is filed regarding any Overstated and/or Partially Unliquidated Claim, each such Overstated and/or Partially Unliquidated Claim, and the Objection as it pertains to such Overstated and/or Partially Unliquidated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated and/or Partially Unliquidated Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the

applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Overstated and/or Partially Unliquidated Claims

FTX Trading Ltd. 22-11068 (JTD)
Forty-Second Omnibus Claims Objection
Schedule 1 - Modified Claims

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
85559	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			BTC			0.000213446371713
			DOT	10,004.292296599120000		10,004.292296599120000
			ETH			0.000262959756536
			ETH-1230			-0.000000000000113
			ETH-PERP			-0.000000000000113
			ETHW			0.009760688661701
			FTT			28.142297421575602
			SOL	640.012167792498800		640.012167792498800
			SRM			185.721959240000000
			SRM_LOCKED			756.880678160000000
			TOMO			0.000000010000000
			TRX			0.000000002430974
			USD	1,212,349.755680424000000		1,212,349.755680424000000
			USDT	428,314.089413880000000		428,314.089413880000000
			WAVES			0.000000010000000
			WBTC			0.000000002000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.

66291*	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			1INCH	0.168315850000000		0.168315850000000
			ALEPH	0.426870000000000		0.426870000000000
			BAT	0.416480000000000		0.416480000000000
			BNB	8,487.905793900000000		8,487.905793900000000
			BNT	0.009117000000000		0.009117000000000
			BTC	0.000125439536663		0.000125439536663
			BTC-20210625	-0.000000000000003		-0.000000000000003
			BTC-PERP	-0.000000000000014		-0.000000000000014
			COMP	0.000065273000000		0.000065273000000
			COPE	0.055005000000000		0.055005000000000
			DOGE	0.727825000000000		0.727825000000000
			ETH	31.008091275000000		31.008091275000000
			ETH-20210625	-0.000000000000113		-0.000000000000113
			ETHW	31.008541900000000		31.008541900000000
			FTT	150.024916155531000		150.024916155531000
			NFT (322623088256694790/FTX FOUNDATION GROUP DONATION CERIFICATE #182)			1.000000000000000
			NFT (372097731343025479/FTX FOUNDATION GROUP DONATION CERIFICATE #98)			1.000000000000000
			NFT (430146615377697122/FTX FOUNDATION GROUP DONATION CERIFICATE #44)			1.000000000000000
			NFT (454710056699082911/FTX FOUNDATION GROUP DONATION CERIFICATE #94)			1.000000000000000
			NFT (482501193729165157/FTX FOUNDATION GROUP DONATION CERIFICATE #89)			1.000000000000000
			NFT (558532003034819458/FTX FOUNDATION GROUP DONATION CERIFICATE #84)			1.000000000000000
			NFT (564623864457705320/FTX FOUNDATION GROUP DONATION CERIFICATE #90)			1.000000000000000
			OXY	0.067460000000000		0.067460000000000
			PERP	0.000000010000000		0.000000010000000
			RAY	0.653665000000000		0.653665000000000
			ROOK	0.000984367500000		0.000984367500000
			RUNE	0.021244000000000		0.021244000000000
			SOL	0.015956639351818		0.015956639351818
			SRM	1,516.391089950000000		1,516.391089950000000
			SRM_LOCKED	11,483.656521040000000		11,483.656521040000000
			USD	14,774,936.870041200000000		14,774,936.870041200000000

*Surviving Claim is also included as a Surviving Claim in the Debtors' Thirty-Eighth Non-Substantive Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
			USDT	4.057985052641700		4.057985052641700
			YFI			0.007888496368250
			YFI-PERP	0.000000000000003		0.000000000000003

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.

52842	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			ALCX	0.000000015000000		0.000000015000000
			ALCX-PERP	0.0000000000000002		0.0000000000000002
			AVAX	25.040216493468016		25.040216493468016
			AXS-PERP	0.0000000000000184		0.0000000000000184
			BADGER	2,208.940000000000000		2,208.940000000000000
			BTC			0.587897610389557
			BTC-0325	-0.000000000000018		-0.000000000000018
			BTC-0624	-0.000000000000003		-0.000000000000003
			DAI	1,548,646.026129110500000		1,548,646.026129110500000
			ETH			107.722721540162700
			ETH-0624	0.000000000000000		0.000000000000000
			ETHW	107.139767900251970		107.139767900251970
			FTT	419.400990190000000		419.400990190000000
			JET	0.000040000000000		0.000040000000000
			LUNA2	0.009713352543000		0.009713352543000
			LUNA2_LOCKED	0.022664489270000		0.022664489270000
			REEF	369,850.000000000000000		369,850.000000000000000
			SOL	0.002962754453966		0.002962754453966
			SRM	208.579464640000000		208.579464640000000
			SRM_LOCKED	1,926.200535360000000		1,926.200535360000000
			SUSHI	0.091445000000000		0.091445000000000
			USD	6,869,323.029512678000000		6,869,323.029512678000000
			USDT	0.006962329033943		0.006962329033943
			USTC	1.374972000000000		1.374972000000000
			WBTC	0.000017450000000		0.000017450000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.

55888	Name on file	FTX Trading Ltd.	1INCH	0.000020000000000	FTX Trading Ltd.	0.000020000000000
			AAPL	-0.062651170568838		-0.062651170568838
			AAPL-1230	0.1200000000000459		0.1200000000000459
			AAVE-PERP	-0.0000000000000053		-0.0000000000000053
			ADABULL	531.646284000000000		531.646284000000000
			ADA-PERP	54,104.000000000000000		54,104.000000000000000
			ALTBEAR	256,978.000000000000000		256,978.000000000000000
			ALT-PERP	-0.0000000000000042		-0.0000000000000042
			AMD-0930	0.0000000000000454		0.0000000000000454
			AMD-1230	-0.0000000000000454		-0.0000000000000454
			AMZN	0.137272839808966		0.137272839808966
			AMZN-1230	0.1800000000000518		0.1800000000000518
			APE-PERP	560.8000000000087000		560.8000000000087000
			APT	-14.610949514935225		-14.610949514935225
			ARKK	-1.475990835947740		-1.475990835947740
			ARKK-1230	-401.530000000000000		-401.530000000000000
			ATLAS	347,698.907850000000000		347,698.907850000000000
			ATLAS-PERP	1,925,010.000000000000000		1,925,010.000000000000000
			ATOM	0.019485000000000		0.019485000000000
			ATOMBULL	680,106.800000000000000		680,106.800000000000000
			ATOM-PERP	-12.990000000016200		-12.990000000016200
			AVAX	-0.225240331821869		-0.225240331821869
			AVAX-PERP	4.399999999970990		4.399999999970990
			AXS	50.110747000000000		50.110747000000000
			AXS-PERP	9.000000000006480		9.000000000006480

Asserted Claims				Modified Claim		
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
		BABA		-4.573418972448860		-4.573418972448860
		BABA-0930		0.0000000000000213		0.0000000000000213
		BABA-1230		2,158.280000000000000		2,158.280000000000000
		BAL		200.382102750000000		200.382102750000000
		BALBULL		276,208.009313990000000		276,208.009313990000000
		BAL-PERP		-200.330000000000000		-200.330000000000000
		BAT		5,078.401610000000000		5,078.401610000000000
		BAT-PERP		-5,078.000000000000000		-5,078.000000000000000
		BCH-PERP		7.462999999999590		7.462999999999590
		BEAR		1,264,145.710000000000000		1,264,145.710000000000000
		BNB		-0.057677214607629		-0.057677214607629
		BNBBULL		92.253635440000000		92.253635440000000
		BNB-PERP		-11.900000000013300		-11.900000000013300
		BRZ		0.482188630163421		0.482188630163421
		BTC		0.009477651498350		0.009477651498350
		BTC-0325		0.000000000000000		0.000000000000000
		BTC-0624		0.000000000000003		0.000000000000003
		BTC-0930		0.000000000000000		0.000000000000000
		BTC-PERP		-0.010000000000722		-0.010000000000722
		BULL		2.024549689000000		2.024549689000000
		CAD		-1,392.896767230215600		-1,392.896767230215600
		CEL		0.072704608531664		0.072704608531664
		CEL-PERP		-0.000000000043655		-0.000000000043655
		CHZ-PERP		7,190.000000000000000		7,190.000000000000000
		CLV-PERP		-0.000000000069860		-0.000000000069860
		COIN		-0.975603038711553		-0.975603038711553
		CRV-PERP		37,866.000000000000000		37,866.000000000000000
		DEFIBEAR		138,666.355000000000000		138,666.355000000000000
		DEFI-PERP		0.000000000000029		0.000000000000029
		DOGE		-401.274502786319900		-401.274502786319900
		DOGEBULL		362.873240000000000		362.873240000000000
		DOGE-PERP		13,576.000000000000000		13,576.000000000000000
		DOT		1,288.477556192995500		1,288.477556192995500
		DOT-0325		0.000000000000301		0.000000000000301
		DOT-PERP		0.000000000020463		0.000000000020463
		DYDX-PERP		33,840.900000000000000		33,840.900000000000000
		ENS-PERP		73.399999999999900		73.399999999999900
		EOS-PERP		-133.899999999761000		-133.899999999761000
		ETCBULL		686.783800000000000		686.783800000000000
		ETC-PERP		100.800000000020000		100.800000000020000
		ETH		25.807589396400440		25.807589396400440
		ETH-0325		-0.000000000000008		-0.000000000000008
		ETH-0624		0.000000000000000		0.000000000000000
		ETH-0930		0.000000000000031		0.000000000000031
		ETH-1230		3.429000000000170		3.429000000000170
		ETHBULL		48.141775600000000		48.141775600000000
		ETH-PERP		2.439999999991240		2.439999999991240
		ETHW		73.908207885301760		73.908207885301760
		EUR		5.164626035093821		5.164626035093821
		EXCH-PERP		0.000000000000003		0.000000000000003
		FB		-0.000258562142453		-0.000258562142453
		FB-0930		-0.000000000000031		-0.000000000000031
		FB-1230		-0.000000000000454		-0.000000000000454
		FIL-PERP		-391.699999999996000		-391.699999999996000
		FLOW-PERP		0.000000000020008		0.000000000020008
		FTM		14,248.834127969147000		14,248.834127969147000
		FTT		149,386.293477550000000		149,386.293477550000000
		FTT-PERP		-18,675.199999999900000		-18,675.199999999900000
		GALA-PERP		34,320.000000000000000		34,320.000000000000000
		GBP		34.577404847045610		34.577404847045610
		GDX-1230		72.570000000000200		72.570000000000200
		GLD		-0.095666511503601		-0.095666511503601
		GLD-0930		-0.000000000000003		-0.000000000000003
		GLD-1230		0.000000000000274		0.000000000000274
		GME-0930		-0.000000000000071		-0.000000000000071
		GME-1230		-0.000000000000113		-0.000000000000113

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
			GMT-PERP	-1,575.0000000000000000		-1,575.0000000000000000
			GODS	0.1951740000000000		0.1951740000000000
			GOOGL	-0.860353833946866		-0.860353833946866
			GOOGL-0930	0.000000000000397		0.000000000000397
			GOOGL-1230	1.680000000000200		1.680000000000200
			GOOGLPRE	-0.00000002033385		-0.00000002033385
			GRT-PERP	14,288.00000000000000		14,288.00000000000000
			GST-PERP	58,609.29999999970000		58,609.29999999970000
			HALF	0.0392904000000000		0.0392904000000000
			HEDGE	35.827897115000000		35.827897115000000
			HOOD	17.501674101322376		17.501674101322376
			HT-PERP	0.000000000000724		0.000000000000724
			JPY	391,817.96639450000000		391,817.96639450000000
			KNC-PERP	-0.00000000031832		-0.00000000031832
			LINK	16,137.455319190702000		16,137.455319190702000
			LINKBULL	393,130.70000000000000		393,130.70000000000000
			LINK-PERP	80.200000000089900		80.200000000089900
			LOOKS-PERP	-4,937.000000000000000		-4,937.000000000000000
			LRC-PERP	-6,369.000000000000000		-6,369.000000000000000
			LTC	1,831.797158890008000		1,831.797158890008000
			LTC-PERP	115.109999999999000		115.109999999999000
			LUNA2	185.067514770500000		185.067514770500000
			LUNA2_LOCKED	431.824201131200000		431.824201131200000
			LUNC	1,192.842404668342000		1,192.842404668342000
			LUNC-PERP	-0.00000000000909		-0.00000000000909
			MANA-PERP	-659.000000000000000		-659.000000000000000
			MATIC	23,929.540991172937000		23,929.540991172937000
			MSTR	-0.159911695683863		-0.159911695683863
			MSTR-0930	-0.00000000000113		-0.00000000000113
			MSTR-1230	-0.00000000000142		-0.00000000000142
			MTL-PERP	-460.99999999979000		-460.99999999979000
			NEAR	0.0229800000000000		0.0229800000000000
			NEAR-PERP	-1,620.900000000000000		-1,620.900000000000000
			NFLX	0.781441054818522		0.781441054818522
			NFLX-0930	-0.00000000000195		-0.00000000000195
			NFLX-1230	-0.21999999999642		-0.21999999999642
			NIO	-0.010747159949382		-0.010747159949382
			NIO-1230	-12,427.35000000000000		-12,427.35000000000000
			NOK	-2.320624552912472		-2.320624552912472
			NOK-0930	-0.00000000000071		-0.00000000000071
			NOK-1230	-0.00000000000198		-0.00000000000198
			NVDA	-0.021071179887643		-0.021071179887643
			NVDA-0930	0.00000000000110		0.00000000000110
			NVDA-1230	0.00000000000188		0.00000000000188
			OKB-PERP	0.00000000000092		0.00000000000092
			ONE-PERP	-261,790.0000000000000		-261,790.0000000000000
			PAXG	0.004093332000000		0.004093332000000
			PAXG-PERP	-0.00000000000014		-0.00000000000014
			POLIS	4,287.471695000000000		4,287.471695000000000
			POLIS-PERP	-4,287.19999999980000		-4,287.19999999980000
			PYPL	0.000161913175348		0.000161913175348
			PYPL-0930	0.00000000000009		0.00000000000009
			PYPL-1230	-0.00000000000198		-0.00000000000198
			PYTH_LOCKED	100,000,000.000000000000		100,000,000.000000000000
			RUNE-PERP	13,906.00000000000000		13,906.00000000000000
			SHIB-PERP	-7,900,000.000000000000		-7,900,000.000000000000
			SLP-PERP	-154,260.0000000000000		-154,260.0000000000000
			SLV	-0.018326280534476		-0.018326280534476
			SLV-0930	0.000000000000540		0.000000000000540
			SLV-1230	-2,550.000000000000000		-2,550.000000000000000
			SNX-PERP	-581.10000000010000		-581.10000000010000
			SOL	-18.279416736979474		-18.279416736979474
			SOL-0325	-0.00000000000085		-0.00000000000085
			SOL-PERP	0.000000000066847		0.000000000066847
			SPELL	27,370,513.1900000000000		27,370,513.1900000000000
			SPELL-PERP	-7,095,000.000000000000		-7,095,000.000000000000

Asserted Claims				Modified Claim		
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
			SPY	-0.000430566273444		-0.000430566273444
			SPY-0930	0.000000000000113		0.000000000000113
			SPY-1230	-0.000000000000014		-0.000000000000014
			SQ	2.310553636115446		2.310553636115446
			SQ-1230	-0.000000000000049		-0.000000000000049
			SRM	341.597325680000000		341.597325680000000
			SRM_LOCKED	10,527.462674320000000		10,527.462674320000000
			SRM-PERP	4,618.000000000000000		4,618.000000000000000
			STEP-PERP	-129,003.700000001000000		-129,003.700000001000000
			SUSHI	4,804.250475000000000		4,804.250475000000000
			SUSHI-PERP	-1,484.000000000000000		-1,484.000000000000000
			THETA-PERP	-0.000000000024556		-0.000000000024556
			TRX	22,386.501775000000000		22,386.501775000000000
			TRX-PERP	3,061.000000000000000		3,061.000000000000000
			TRY	36,217.821151726500000		36,217.821151726500000
			TRYB	29,283.810854722004000		29,283.810854722004000
			TRYB-PERP	-10,953.000000000000000		-10,953.000000000000000
			TSLA	-0.003230290851143		-0.003230290851143
			TSLA-0930	0.000000000000113		0.000000000000113
			TSLA-1230	0.000000000001534		0.000000000001534
			TSLAPRE	-0.000000003738941		-0.000000003738941
			TSLAPRE-0930	-0.000000000000321		-0.000000000000321
			TWTR	-0.000000002910394		-0.000000002910394
			TWTR-0930	0.000000000000113		0.000000000000113
			TWTR-1230	-0.000000000001023		-0.000000000001023
			UBER-0930	-0.000000000001136		-0.000000000001136
			UBER-1230	-0.000000000000362		-0.000000000000362
			UNI	0.135479441175967		0.135479441175967
			USD	498,225.715000000000000		468,510.629001738400000
			USDT	126,259.587466141800000		126,259.587466141800000
			USO	0.025136284113048		0.025136284113048
			USO-0930	-0.000000000000113		-0.000000000000113
			USO-1230	0.000000000000795		0.000000000000795
			USTC	40.232922880561930		40.232922880561930
			WAVES-PERP	-596.000000000000000		-596.000000000000000
			XLM-PERP	-8,698.000000000000000		-8,698.000000000000000
			XRP	39,109.183832642870000		39,109.183832642870000
			XRPBULL	1,004,463.670000000000000		1,004,463.670000000000000
			XRP-PERP	65,351.000000000000000		65,351.000000000000000
			XTZ-PERP	0.008000000003448		0.008000000003448
			YFI-PERP	0.178999999999998		0.178999999999998
			ZEC-PERP	0.000000000000159		0.000000000000159
			ZIL-PERP	19,170.000000000000000		19,170.000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat overstate the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.